

EXHIBIT B

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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ZHENG WU a/k/a BRUNO WU and
YANG LAN,

Index No.

Plaintiffs,

Date Purchased:
March 8, 2018

-against-

GUO WENGUI
a/k/a MILES KWOK,

SUMMONS

Defendant.

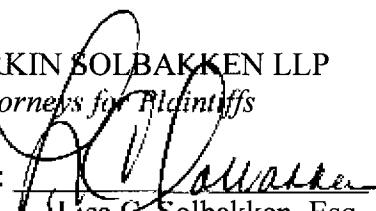
Basis of Venue:
Defendant's Residence

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TO THE ABOVE-NAMED DEFENDANT:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer on the Plaintiffs' attorneys within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: March 8, 2018

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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

X

ZHENG WU a/k/a BRUNO WU and
YANG LAN,

Index No.

Plaintiffs,

-against-

COMPLAINT

GUO WENGUI
a/k/a MILES KWOK,

Defendant.

X

Plaintiffs Zheng Wu, a/k/a Bruno Wu, and Yang Lan, by their attorneys Arkin Solbakken LLP, as and for their complaint against Defendant Guo Wengui, hereby state as follows:

PRELIMINARY STATEMENT

1. This action is brought against Defendant Guo Wengui (“Guo”), a citizen of numerous countries including Hong Kong, the United Arab Emirates, and the Republic of Malta, who—after having been accused and convicted of a broad array of criminal acts—fled to the United States with the hope of purchasing for himself the type of unofficial asylum reserved for those of extreme wealth.

2. Indeed, notwithstanding evidence tying Guo to money laundering schemes, forgery, bribery and physical and sexual assault, Guo has been able to obtain temporary refuge from his crimes in the United States, where he purchased a penthouse apartment in the prestigious Sherry Netherland at 781 Fifth Avenue, New York, New York for which he paid \$67.5 million—in cash.

3. With this new home becoming a base of operation, Guo commenced his propaganda campaign designed to meet his twin objectives of obfuscating his criminality and increasing the odds that his pending political asylum application is granted.

4. In particular, Guo has sought to define himself as a liberal-minded refugee by dribbling out over social media largely nonsensical claims of purported acts of corruption and high drama within the People's Republic of China ("PRC" or "China").

5. By these yarns, Guo pitches himself as a "pioneer of using YouTube and Twitter to fight for the rule of law, human rights, freedom and democracy in China."

6. But in reality, Guo is nothing more than a two bit con-man.

7. His "revelatory" claims of political corruption are little more than cheap and defamatory falsehoods about the personal lives of various Chinese and American citizens that Guo hopes to paint as antagonists of soap operatic proportions, and which he then feeds to his millions of "followers."

8. Guo does not expose "corruption"; instead, he uses the internet as an extension of his chaotic and criminal enterprise.

9. This action is brought to hold Guo to account for his wanton and malicious acts of defamation and to compensate those his deluded efforts have harmed.

JURISDICTION AND VENUE

10. Pursuant to CPLR 301 and CPLR 302, this Court has jurisdiction over Guo because he is a resident of, and regularly conducts business in, New York County and New York State.

11. Pursuant to CPLR 503(a), venue is proper because Guo resides in New York County and has been actively publishing defamatory statements from his residence in this County.

THE PARTIES

12. Plaintiff Zheng Wu is successful Chinese-American investor and media entrepreneur and a published author.

13. Plaintiff Zheng Wu also serves as a member of the intentional board of Museum of Television & Radio in New York & Los Angeles.

14. Plaintiff Zheng holds a Bachelor's degree in business management from Culver-Stockton College of Missouri, a Master's degree in international relations from Washington University in St. Louis, and a Doctor of Philosophy (Ph.D.) from the School of International Relations and Public Affairs at Fudan University.

15. Plaintiff Yang Lan is a leading broadcast journalist and media entrepreneur in China, well-known for her focus on social and cultural issues.

16. Plaintiff Yang Lan was recognized by Forbes as one of the world's 100 most powerful women.

17. Plaintiff Yang Lan has a Bachelor's degree in English language and literature from Beijing Foreign Studies University and a Master's degree in international affairs from Columbia University.

18. Plaintiffs have been married for twenty-three years and reside together in Beijing, China. Throughout their marriage, Plaintiffs worked together on numerous business and charitable ventures.

19. For example, Plaintiffs co-founded Sun Seven Stars Capital Group (“Seven Stars”), through its predecessor Sun Media Group Holdings Limited, in 1999 and developed the company into one of the leading entertainment, media, and investment companies in Asia.

20. Seven Stars has a presence in over 10 major cities around the world and earns billions of dollars in sales annually.

21. Plaintiff Zheng Wu serves as Seven Stars’ Co-Chair and Chief Executive Officer.

22. Plaintiff Yang Lan serves as Seven Stars’ Co-Chair.

23. Plaintiffs also worked together in support of charitable organizations, including co-founding the Sun Culture Foundation which focuses on providing equal educational opportunities for underprivileged children and sponsoring Beijing’s “Giving Pledge” event with the Bill & Melinda Gates Foundation.

24. Defendant Guo is a billionaire who purports to have made his money in various real estate ventures in China, and who now lives in “self-imposed exile” in New York City. Guo has sought permanent residence in the United States via an application for asylum, predicated on nonsensical claims levied by him in an effort to present himself to the United States government as a political refugee.

25. Guo possesses passports from numerous countries, including those from Hong Kong, the United Arab Emirates, and the Republic of Malta, and uses a number of aliases, including Guo Wen Gui, Guo Haoyun and Miles Kwok, among others.

26. Guo also maintains and controls a number of media accounts, including a Twitter account with the handle @KwokMiles (which has approximately 494,000 followers) and at least two YouTube accounts under the usernames “Miles Kwok” (which has approximately 11,000 subscribers) and “郭文贵” (which has approximately 174,678 subscribers).

FACTUAL BACKGROUND

27. Contrary to victimology cultivated by Guo through media manipulation, he is not now, nor has he ever been, a political prisoner of the PRC.

28. Instead, Guo's relationship with the criminal authorities first began when he was approximately 18 years old and convicted of fraud, whereupon he was imprisoned along with others determined to be guilty of acts of petty thievery.

29. Guo was not, as he otherwise contends, jailed with "pro-democracy activists and political dissidents."

30. Subsequent to this period of incarceration, Guo went on to engage in increasingly more sophisticated financial frauds, concocting Ponzi schemes designed to enrich himself personally, to the detriment of his unwitting victims and the unfortunate business "partners" he ultimately turned against.

31. For example, Guo engaged in a series of fraudulent transactions whereby hundreds of millions of dollars were fraudulently obtained from the Agricultural Bank of China through the use of fake contracts, false receipts and creative interpretations of the word "leverage."

32. Guo also undertook efforts to work with officials from (and ultimately began to work for) China's Ministry of State Security ("MSS"), China's central intelligence agency with both domestic and foreign jurisdiction.

33. In particular, Guo struck up a close relationship with MSS leader Ma Jian, which resulted in Guo's participation in a number of covert and illegal acts, including "investigations" targeting Chinese nationals and United States political leaders, for which Guo has received medals from his MSS colleagues.

34. Other Guo associates are now, like Ma Jian, under investigation or prosecution for bribery and abuse of power crimes, including Zhang Yue, who acted as the Head of the Politics and Law Committee in China's Hebei Province, and Meng Huiqing, who was an official with CPC's Ant-Corruption Commission.

35. But Guo's acts were not predicated on Guo's belief in any particular political philosophy; instead, like everything else Guo undertakes, he sought to benefit personally from his relationship with the government, particularly with corrupt officials in intelligence and law enforcement agencies.

36. This included telling those he was assisting in investigating that he might obtain lighter sentences for them – so long as they transferred over to Guo their assets for Guo's personal use.

37. Guo also took as many precautions as he could to insulate himself from having to answer for his double dealing, often recording or video-taping government officials or business colleagues and acquaintances with sex workers Guo himself employed and planted – recordings he then used as a means of extortion.

38. And when politics in China changed, so did Guo's "loyalty."

39. Indeed, on more than one occasion Guo has promised allegiance to the PRC if only they will take him back with the promise of no prosecution.

40. In exchange for special treatment by the PRC, Guo also (a) promised to provide the location of various Chinese political dissidents in the United States, (b) spied on and wiretapped various government figures, including former United States Secretary of Homeland Security Jeh Charles Johnson and former United Kingdom Prime Minister Tony Blair, for which he has received MSS medals, and (c) colluded with various terrorist organizations.

41. Far from being the anti-government crusader that he portrays himself to be from his comfortable surroundings in New York City, Guo was and is more than happy to remain an agent of the government that he now claims to hate – so long as there is something in it for him.

GUO IS OUTED BY THE MEDIA

42. Eventually, the story of Guo's wrongdoing and the toxicity of associating with him came to light by and through the press.

43. In particular, in 2015, a watershed exposé was published by Caixin Media Company Ltd, implicating Guo in a conspiracy to oust Beijing's mayor and various other potentially wrongful acts he had undertaken.

44. This same article reported on Guo's plan to video the deputy mayor of Beijing's private sexual activities as part of a scheme to discredit the municipality's political leaders and to enable Guo to acquire development rights to a plaza located near the Bird's Nest stadium in the Olympic Park of Beijing.

45. By at least one account, Caixin's coverage lead to an article that became the most widely read article in the history of Chinese journalism.

46. Moreover, media outlets began reporting in April 2017 that former MSS leader Ma Jian abused his power between 2008 and 2014 to jail, extort, or seize the property of Guo's business rivals in exchange for millions of dollars in bribes from Guo.

47. The media also reported that Guo paid millions of dollars to former Hebei Provincial Police Chief Zhang Yue, who in return interfered with and investigated Guo's business rivals, allowing Guo to obtain favorable deal terms or shutting out competition.

48. As a result of these reports and follow-on reporting, Guo was thrust into the international discourse.

49. Guo's crimes, too, have garnered international attention, with reports of a Red Notice having been issued by Interpol in April 2017.¹

GUO'S DUPLICITY AND RETALIATION

50. As noted above, Guo fled the PRC to avoid answering for his crimes.

51. Since that time, he has made numerous efforts to "buy" his way back into his home country in a way that would allow him to avoid jail time -- including but not limited to letters written to the Chinese government that beg for a homecoming and which pledge allegiance to the PRC.

52. Always one to hedge his bets, however, simultaneously Guo has unleashed a series of schemes designed to afford him respite in the United States.

53. Chief among these schemes was Guo's decision to develop a fan base cultivated by attacks, perpetrated over social media, on the PRC, the press agents that have reported on his "business practices" in China, and anyone else, including Plaintiffs, who he believes (rightly or wrongly) might have information which could negatively influence his ability to remain safely ensconced on his billionaire perch in New York City.

54. Notably, Guo seems to take particular pleasure in defaming females, primarily by implicating them in sexual acts (that have never taken place) but which would act to embarrass, humiliate and harm their reputations.

55. Guo's misogynist protocol also carries with it the benefit of potential embarrassment to the partners and children of his targets.

¹ A "Red Notice" is defined by Interpol as "a request to locate and provisionally arrest an individual pending extradition."

56. For example, Guo used his social media accounts to attack Hu Shuli, the founder and Chief Executive of Caixin, a former Knight Journalism Fellow at Stanford, and a well-respected journalist.

57. In particular, Guo indicated that Ms. Hu engaged in “sex [abuse] games” with various Chinese officials. Ms. Hu has denied any such sexual activity or relationship, and her defamation suit (in which Caixin is a co-Plaintiff) is pending before this Court. *See Caixin Media Company Ltd., et al. v. Wengui*, Index. No. 652154-2017 (N.Y. Sup. Ct. N.Y. Cty. 2017).

58. Similarly, Guo has targeted Huang Yan, a female Chinese government official. By Ms. Huang’s defamation claim (which is also pending in this Court), Guo is accused of egregious misstatements about her sex life, including but not limited to claims that she attained her position by engaging in sexual favors. *See Huang Yan v. Wengui*, Index No. 156552/2017 (N.Y. Sup. Ct. N.Y. Cty. 2017).

59. Regrettably, this is just a small sample of those targeted by Guo’s infatuation with female sexuality. Others victimized include Fan Bingbing, Xu Qing, Gao Yanyan, Li Bingbing, Lin ZhilingDong Qing, Li Sisi, Mei Tong, Wanf Fang, Shu Xiaoqing, Zeng Chang, and (as described more fully below), Plaintiff Yang Lan.

GUO TARGETS PLAINTIFFS

60. Commencing in 2017, Guo began targeting Plaintiffs.

A. Guo’s Defamatory Statements About Plaintiff Yang Lan

61. Plaintiff Yang Lan is a household name in China and a leading broadcast journalist and media entrepreneur devoted to promoting general equality and women’s professional development.

62. For example, Plaintiff Yang Lan created a talk show called “Yang Lan Studio,” now named “Yang Lan One on One,” which has become China’s longest-running in-depth talk show, with more than 900 interviews with leaders from around the world.

63. Plaintiff Yang Lan also created “Her Village,” a television show geared towards a Chinese urban female audience, which seeks to promote gender equality and women’s professional development through online and off-line educational programs.

64. For reasons that remain unclear, Guo believes Plaintiff Yang Lan is a threat to his political asylum application and his continued stay here in the United States.

65. Accordingly, Guo has sought to tarnish Plaintiff Yang Lan’s reputation as a successful female media entrepreneur and role model to women in China by publishing sex-focused defamatory statements about Plaintiff Yang Lan. This is Guo’s modus operandi.

66. For example, on September 15, 2017, Guo published a video recording of himself to his “郭文贵” YouTube account wherein Guo stated that Plaintiff Yang Lan (a) maintained many “lovers” and engaged in an extra marital affair with “her sexual Xinjiang boyfriend,” (b) “used genitals to build this powerful relation of law and order” and had extra marital affairs with Meng Jianzhu and Sun Lijun in exchange for the privilege of “presid[ing] over major national events,” (c) had extra marital affairs with “sexually perverted” government officials “which led to her uterine cancer,” and (d) “secretly had surgery on her uterine cancer in Beijing Concord Hospital.”

67. This video has been viewed over 296,220 times since Guo published it and is still available for viewing on YouTube.

68. On September 16, 2017, Guo stated in a live-streamed YouTube video that (a) “Yang Lan’s Sun TV is for money-laundering and money scam” and (b) “Yang Lan deceived people by helping the great afforestation.”

69. This video has been viewed over 380,499 times and is still available for viewing on YouTube.

70. On September 19, 2017, Guo stated in a live-streamed YouTube interview with Chen Xiaoping on YouTube user Mingjing Huopai’s account² that Plaintiff Yang Lan (a) has “serious sexually transmitted diseases,” (b) is “full of [sexually transmitted] diseases,” (c) “sleeps with men who suffer[] from skin diseases,” (d) had an extra marital affair with “Meng Jianzhu” which was filmed and “will shock everyone,” (e) “has infectious and erosive uterine cancer,” (f) has engaged in numerous extra marital affairs, and (g) “asks [her husband] to take her to sleep with men from home and abroad.”

71. The video of this interview has been viewed at least 385,459 times and is still available for viewing on YouTube.

72. These statements are entirely false and defamatory.

73. Guo was aware of the falsity of these statements at the time that he made them, or at the least, he has made these statements with reckless disregard for their falsity.

B. Guo’s Defamatory Statements About Plaintiff Zheng Wu

74. Guo also believes that Plaintiff Zheng Wu is a threat to his political asylum application and his continued stay here in the United States. Accordingly, Guo has sought to tarnish Plaintiff Zheng Wu’s reputation largely by falsely accusing Plaintiff Zheng Wu of horrific crimes and heinous acts against children.

² YouTube user Mingjing Huopai has approximately 130,545 subscribers.

75. For example, on September 15, 2017, Guo published a video recording of himself to his “郭文贵” YouTube account wherein Guo stated that Plaintiff Zheng Wu (a) “came to the United States to find all those who may be close to [Guo] and those who know [Guo]” and then “wanted to pay to have [Guo] killed,” (b) kidnapped Fu Zhenghua, (c) “is a typical Chinese trained spy,” (d) tried to bribe Guo’s attorney with “\$10 million to fight against Guo,” (e) sought to hire “mafia killers” to kill Guo, (f) “continue[s] to hire to murder” in New York, and (g) “participated in [the] killing of Lei Yang” (a 29 year-old Chinese environmentalist who died while in police custody), (h) hired Li Dong “to eliminate all people who were aware of” money that Guo purports Plaintiff Zheng Wu received “overseas as the political stability fee,” (i) has fathered “illegitimate children abroad,” and (j) is a “gangster[].”

76. This video has been viewed over 296,220 times since Guo published it and is still available for viewing on YouTube.

77. On September 16, 2017, Guo stated in a live-streamed YouTube video that “Wu Zheng’s academic credentials are fabricated.”

78. This video has been viewed over 380,499 times and is still available for viewing on YouTube.

79. On September 19, 2017, Guo stated in a live-streamed YouTube interview with Chen Xiaoping on YouTube user Mingjing Huopai’s account that Plaintiff Zheng Wu (a) participated in the murder of Lei Yang, (b) participated in a criminal conspiracy involving the raping of children, (c) asked his wife, Plaintiff Yang Lan, “to sleep with [a British] foreigner while he watched the door,” (d) used his wife as a “sex tool” and took his wife “time and time again” to sleep with foreign officials, and (e) “is a trained spy of Shanghai.”

80. The video of this interview has been viewed at least 385,459 times and is still available for viewing on YouTube.

81. These statements are entirely false and defamatory.

82. Guo was aware of the falsity of these statements at the time that he made them, or at the least, he has made these statements with reckless disregard for their falsity.

83. For example, approximately one-third of the way into the September 19, 2017 live-streamed YouTube interview, Chen Xiaoping cautioned Guo that Plaintiff Zheng Wu “will sue [Guo]” if Guo continued with his defamatory statements about Plaintiff Zheng Wu. Guo responded by saying “[d]on’t worry, I especially welcome him to sue me,” and then continued making defamatory statements about Plaintiffs.

GUO’S THREATS OF VIOLENCE

84. In addition to the foregoing, Guo has taken to implicitly threatening or directly encouraging violence as against Plaintiffs.

85. For example, in the September 19, 2017 live-streamed YouTube interview with Chen Xiaoping, Guo suggested that Plaintiff Yang Lan will “not be able to live a long life,” and that she may “disappear at any time.”

86. In the same breath, Guo also stated that Plaintiff Zheng Wu “may be killed at any time as he did too many bad things, he may get into a car accident or die of disease at any time, both are possible.”

87. As to when such harm might befall either of the Plaintiffs, Guo went on to state: “[r]ight now, [I] cannot give any specific details.”

FIRST CAUSE OF ACTION

(Defamation *Per Se*)

88. Plaintiffs incorporate by reference all preceding and succeeding paragraphs of this Complaint.

89. Through speech, postings to social media accounts and websites, and various other writings, Guo has falsely and with malice repeatedly defamed Plaintiffs, including but not limited to statements meant to convey (i) that Plaintiffs have and continue to engage in outrageous acts of criminality, such as murder and the raping of children, (ii) that Plaintiff Yang Lan has sexually transmitted diseases, and (iii) that Plaintiff Yang Lan engaged in extra marital affairs to advance her career.

90. These statements have damaged Plaintiffs' reputations among a large number of people, and have caused them to associate Plaintiffs with sexual depravity, promiscuity, and criminal behavior.

91. Guo knows these statements are false, or has at least acted with reckless disregard as to the truth of such statements.

92. Guo made these statements with the intent of maliciously damaging Plaintiffs and their reputations, harming their business interests and to induce others to not do business with them.

93. Guo had neither the authorization nor the privilege to make such statements.

SECOND CAUSE OF ACTION

(Defamation)

94. Plaintiffs incorporate by reference all preceding and succeeding paragraphs of this Complaint.

95. Through speech, postings to social media accounts and websites, and various other writings, Guo has falsely and with malice repeatedly defamed Plaintiffs, including but not limited to statements meant to convey (i) that Plaintiffs have and continue to engage in outrageous acts of criminality, such as murder and the raping of children, (ii) that Plaintiff Yang Lan has sexually transmitted diseases, and (iii) that Plaintiff Yang Lan engaged in extra marital affairs to advance her career.

96. These statements have damaged Plaintiffs' reputations among a large number of people, and have caused them to associate Plaintiffs with sexual depravity, promiscuity, and criminal behavior.

97. Guo knows these statements are false, or has at least acted with reckless disregard as to the truth of such statements.

98. Guo made these statements with the intent of damaging Plaintiffs and their reputations, harming their business interests and to induce others to not do business with them. Guo had neither the authorization nor the privilege to make such statements.

99. Plaintiffs have suffered harm as a result of Defendant's conduct, in a monetary amount to be determined at trial.

THIRD CAUSE OF ACTION

(Intentional Infliction of Emotional Distress)

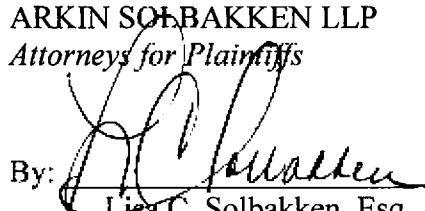
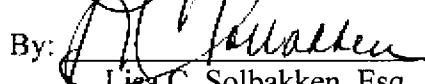
100. Guo made these statements, as well as the others identified above, with the intent to cause severe emotional distress to Plaintiffs, or at the least, he has made these statements while recklessly disregarding the substantial likelihood that they would cause Plaintiffs emotional distress.

101. Directly because of these false and outrageous statements, Plaintiffs have experienced emotional distress, shame, repeated bouts of anxiety, inconvenience, mental anguish, loss of enjoyment of life and other non-pecuniary losses.

WHEREFORE, Plaintiffs request entry of Judgment in their favor and against Defendant as follows:

- (i) compensatory and punitive damages in an amount to be determined at trial, but no less than \$10 million;
- (ii) enjoining Defendant and anyone acting or purporting to act on his behalf from making any of the false and defamatory statements set forth herein, or similarly false and defamatory statements involving Plaintiffs;
- (iii) punitive damages;
- (iv) the costs and expenses incurred in this action including attorneys' fees; and
- (v) such other and further relief as the Court deems just and proper.

Dated: March 8, 2018

ARKIN SOLBAKKEN LLP
Attorneys for Plaintiffs

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NYSCEF - New York County Supreme Court

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152123/2018

Zheng Wu et al - v. - Guo Wengui

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Hon. Milton A. Tingling, New York County Clerk and Clerk of the Supreme Court

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